

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

Turner P. Smith
L.P. Harrison 3rd
Andrew H. Seiden
Peter J. Behmke
101 Park Avenue
New York, New York 10178
Counsel for Lehman Plaintiffs
-and-

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Daniel P. Cunningham
Andrew J. Rossman
James C. Tecce
51 Madison Avenue, 22nd Floor
New York, New York 10010
*Special Counsel for Intervenor-Plaintiff, Official Committee of
Unsecured Creditors of Lehman Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re: : Chapter 11
: Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., *et al.*, :
:
Debtors. :
----- X

**STIPULATION, AGREEMENT AND ORDER BETWEEN THE PLAINTIFFS AND
BRACEBRIDGE-MANAGED FUNDS EXTENDING THE TIME TO OBJECT AND TO
REPLY TO ANY OBJECTION TO THE MOTION TO CONSOLIDATE CONTESTED
MATTER WITH ADVERSARY PROCEEDING AND FOR RELATED RELIEF**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Plaintiffs Lehman Brothers Special Financing Inc. ("LBSF"), Lehman Brothers
Commodity Services Inc. ("LBCS"), Lehman Brothers Commercial Corporation ("LBCC" and
collectively with LBSF and LBCS, the "Lehman Subsidiaries"), and Lehman Brothers Holdings
Inc. ("LBHI"; and together with the Lehman Subsidiaries, "Lehman") as debtors and debtors in
possession, and the Official Committee of Unsecured Creditors of Lehman Brothers Holdings

Inc. (the “Committee”; and together with Lehman, “Plaintiffs”), and FYI Ltd., FFI Fund Ltd. and Olifant Fund, Ltd. (collectively, the “Bracebridge-Managed Funds”) hereby stipulate and agree as follows:

WHEREAS pursuant to *The Second Amended Order Pursuant To Section 105(A) Of The Bankruptcy Code And Bankruptcy Rules 1015(C) And 9007 Implementing Certain Notice And Case Management Procedures* filed on June 17, 2010 (the “Case Management Order”) this Court implemented certain amended notice, case management, and administrative procedures to govern these chapter 11 cases.

WHEREAS pursuant to paragraph 32 of the Case Management Order, the movant may agree to extend the Objection Deadline.

WHEREAS the Bracebridge-Managed Funds filed the *Notice of Motion To Consolidate Contested Matters With Adversary Proceeding And For Related Relief* (the “Notice of Motion”) on February 26, 2013 setting the objection date and time on March 6, 2013 at 4:00 p.m. (Prevailing Eastern Time) (the “Objection Deadline”) and the hearing date at time on March 13, 2013 at 10:00 a.m. (Prevailing Eastern Time) (the “Hearing Date”).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, AND, UPON COURT APPROVAL HEREOF, IT SHALL BE ORDERED THAT:

1. This Stipulation, Agreement and Order shall become effective once it has been executed by the Plaintiffs and the Bracebridge-Managed Funds and approved by the Court (the “Stipulation Effective Date”).

2. The Objection Deadline is extended to March 8, 2013 at 5:00 p.m. (Prevailing Eastern Time).

3. The Bracebridge-Managed Funds' reply deadline is extended to March 12, 2013 at 12:00 p.m. (Prevailing Eastern Time).

4. This Stipulation, Agreement and Order contains the entire agreement between the parties as to the subject matter hereof.

5. Each person who executes this Stipulation, Agreement and Order represents that he or she is duly authorized to do so on behalf of the respective party or parties hereto and that each such party has full knowledge and has consented to this Stipulation, Agreement and Order.

6. This Stipulation, Agreement and Order may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation, Agreement and Order to present any copy, copies, electronic copies, or facsimiles signed by the parties hereto to be charged.

The remainder of this page has been left intentionally blank.

Dated: March 6, 2013
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP

By: /s/ Turner P. Smith
Turner P. Smith
L.P. Harrison 3rd
Andrew H. Seiden
Peter J. Behmke

101 Park Avenue
New York, New York 10178
(212) 696-6000

Counsel for Lehman Plaintiffs

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Andrew J. Rossman
Daniel P. Cunningham
Andrew J. Rossman
James C. Tecce

51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

Benjamin Odell
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000

*Special Counsel for Intervenor-Plaintiff,
Official Committee of Unsecured Creditors
of Lehman Brothers Holdings Inc.*

ROPES & GRAY LLP

By /s/ James A. Wright III
James A. Wright III

Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-3600

*Attorneys for FYI LTD., FFI FUND LTD.,
and OLIFANT FUND, LTD.*

SO ORDERED:

Dated: New York, New York
March 11, 2013

s/ James M. Peck
Honorable James M. Peck
United States Bankruptcy Judge